

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

RENTA CHALEPAH, as)	CASE NO. 8:18-cv-381
PERSONAL REPRESENTATIVE of the)	
ESTATE OF ZACHARY NICHOLAS)	
BEAR HEELS for the benefit of the Heirs)	
and Next of Kin and as PERSONAL)	
REPRESENTATIVE OF THE ESTATE)	
OF ZACHARY NICHOLAS)	
BEAR HEELS, Deceased,)	
)	
)	
v.)	PLAINTIFF'S INDEX OF EVIDENCE IN SUPPORT OF HER MOTION FOR INDIVIDUAL SEQUESTERED VOIR DIRE
)	
THE CITY OF OMAHA, a)	
Municipal Corporation;)	
SCOTTY PAYNE, in his individual)	
and official capacity; RYAN)	
MCCLARTY, in his individual and)	
official capacity; JENNIFER STRUDL,)	
in her individual and official capacity;)	
MAKYLA MEAD, in her individual)	
and official capacity; and SGT. ERIK)	
FOREHEAD, in his individual and)	
official capacity.)	
)	
Defendants.)	

COMES NOW, Plaintiff, Renita Chalepah, and hereby submits her Index of Evidence in Support of Plaintiff's Motion for Individual Sequestered Voir Dire.

Exhibit 1- 3/12/2019 Article by Peter O'Dowd and Savannah Maher

Exhibit 2- 4/23/2020 Article - Three of four OPD officers involved in Bearheels death allowed to return to duty.

Exhibit 3- 3/1/2019 KETV News reported by Sarah Fili

Exhibit 4- Article “Seek Justice Department’s Help Investigating Indigenous Man’s Death in Omaha.

Exhibit 5 - 4/23/2020 U.S. News - Article Panel reinstates 3 Nebraska Officers Fired in Stun Gun Death

Exhibit 6 - 7/26/17 - Police One.Com - Article - 2 Neb. Officers face assault charges in ECD death.

Exhibit 7 - Nebraskans for Peace Article - Frank LaMere speaks on the Anniversary of the Death of Zachary Bear Heels.

Exhibit 8 - 4/23/2020 - This is Money - Article- Panel reinstates 3 Nebraska Officers fired in stun gun death.

Exhibit 9 - 3/6/2019 - Native News Online.Net - Article American Indian Activist Frank Lemere seeks Justice for Zachary Bear Heels who was killed by Police.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on May 29, 2020, I electronically filed the foregoing **Plaintiff's Index of Evidence** with the Clerk of the Court using the CM/ECF system which sent notification of such filing to the attorneys of record listed below:

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